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7 *Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

11 LISA HYDE and MARK HYDE, a
married couple,

**PLAINTIFFS' NOTICE OF LODGING
CERTAIN EXHIBITS RELATED TO
PLAINTIFFS' RESPONSES TO
DEFENDANTS' MOTIONS *IN LIMINE***

12 Plaintiffs,

13 v.

14 C.R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
15 VASCULAR, an Arizona corporation,
16 Defendants.
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19 Pursuant to LRCiv 5.6(d), Plaintiffs submit this Notice of Lodging Certain Exhibits
20 Related to Plaintiffs' Responses to Defendants' Motions *in Limine*.

21 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the
22 Court the documents listed on Exhibit A to this Notice.

23 Defendants contend that the documents listed in Exhibit A are confidential and
24 should be filed under seal. As required under LRCiv 5.6(d), Plaintiffs certify that on
25 August 28, 2018, the parties met and conferred in good faith and were unable to agree
26 about whether the documents are confidential under the Protective Order and should be
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1 filed under seal. Plaintiffs do not believe that the disputed documents warrant continued
2 confidential treatment as proprietary or sensitive trade secret information.

3 This dispute notwithstanding, the parties have agreed to continue to meet and
4 confer on the documents at issue.

5 RESPECTFULLY SUBMITTED this 28th day of August, 2018.

6 GALLAGHER & KENNEDY, P.A.

7 By: /s/ Mark S. O'Connor

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13 *Counsel for Plaintiffs*

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16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this 28th day of August 2018, I electronically transmitted
18 the attached document to the Clerk's Office using the CM/ECF System for filing and
19 transmittal of a Notice of Electronic Filing.

20 /s/ Jessica Gallentine

EXHIBIT A

Plaintiffs' Response to Defendants' Motion <i>in Limine</i> No. 3 to Exclude Evidence of the SNF as a Reasonable Alternative Design	Ex. J, Medical Monitor Meeting Minutes, 08/29/2005
Plaintiffs' Response to Defendants' Motion <i>in Limine</i> No. 3 to Exclude Evidence of the SNF as a Reasonable Alternative Design	Ex. K, McMeeking Rebuttal Report, 05/11/17